

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:20-CR-462
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
v.	)	
	)	
ISAAH TURNER,	)	<u>UNOPPOSED MOTION TO CONTINUE</u>
	)	<u>TRIAL AND RELATED DATES</u>
Defendant.	)	
	)	

The United States of America, by and through its counsel, Bridget M. Brennan, Acting United States Attorney, and Bryson N. Gillard, Assistant United States Attorney, hereby moves the Court to continue the trial and all related dates for Defendant Isaiah Turner, and to waive speedy trial time for the period of the continuance.

On September 20, 2021, the case is scheduled for a final pre-trial conference/change of plea date, with a trial date of October 12, 2021 following. The undersigned has a scheduling conflict with both dates, as he is scheduled to be out of office on September 20, 2021 and scheduled to begin trial in the case of the *United States v. Marcus Jackson* on October 12, 2021. Furthermore, Defendant and the Government would request additional time to further negotiate an agreed upon resolution. Additionally, there is outstanding discovery, as the parties are waiting for the results of the gun shot residue (GSR) test which may potentially aid the parties towards an agreed upon resolution.

Given the undersigned counsel's scheduling conflicts and the possibility of eliminating or streamlining a trial with a negotiated resolution, and the outstanding discovery, the Government

respectfully submit that “the ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

Undersigned counsel has conferred with counsel for Turner, who has indicated that he does not oppose the requested continuance. For these reasons, the government moves the Court to continue the trial and all related dates for Turner, and to waive speedy trial time for the period of the continuance.

Respectfully submitted,

BRIDGET M. BRENNAN  
Acting United States Attorney

By: /s/ Bryson N. Gillard  
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CERTIFICATE OF SERVICE

I hereby certify that on this day, September 16, 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Bryson N. Gillard

Bryson N. Gillard

Assistant U.S. Attorney